

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

District of

Division

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2024 OCT 7 PM 3:47

Case No.

24-1468 (GMM)
(to be filled in by the Clerk's Office)Glenda Falwell
Kevin Falwell

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

SEE ATTACHED

Michael L. Chapman

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☐ Yes ☒ No

RECEIPT #	<u>114503</u>
AMOUNT:	<u>\$405.00</u>
OCT - 7 2024	
<u>[Signature]</u>	
CASHIER'S SIGNATURE	

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

PLAINTIFFS NAMES

GLENDA FALWELL

CASE NO.

KEVIN FALWELL

JURY TRIAL

YES___ NO ☒

v.

DEFENDANTS NAMES

Michael L. Chapman, Sheriff, Loudoun County (VA)
803 Sycolin RD # 301, Leesburg, VA 20175
Telephone Number (703) 777-0445

Loudoun County Sheriff Department
803 Sycolin RD # 301, Leesburg, VA 20175
Telephone Number (703) 777-0445

Kelly Maio, Mental Health Clinician
102 Heritage Way NE Suit 302, Leesburg, VA 20176
Telephone Number (703) 777-5100

Dr. Richard Conner, PsyD
102 Heritage Way NE Suit 302, Leesburg, VA 20176
Telephone Number (703) 777-5100

Loudoun County Mental Health Department
102 Heritage Way NE Suit 302, Leesburg, VA 20176
Telephone Number (703) 777-5100

Rashika J. Rentie, PhD, LP
2851 Duke Street
Alexandria, VA 22314
Telephone n

Eric Shamis, Plaintiff's Court Appointed Lawyer
King Campbell, Poretz & Mitchell, PLLC
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Leesburg, Virginia 20176
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

PLAINTIFFS NAMES

GLENDA FALWELL

CASE NO.

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Deputy Stewart Marcantel
803 Sycolin RD # 301, Leesburg, VA 20175
Telephone Number (703) 777-0445

Deputy Justin M. Sperling
803 Sycolin RD # 301, Leesburg, VA 20175
Telephone Number (703) 777-0445

Officer Brandon Nolan
803 Sycolin RD # 301, Leesburg, VA 20175
Telephone Number (703) 777-0445

Magistrate Victoria C. Dronsick
10488 Moreland Rd. Deplane, VA 20144-2125
Telephone Number Office (561) 669-
Telephone Number Cell (540) 272-0141
3276 Email: vcdesq@yahoo.com

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

PLAINTIFFS NAMES

GLENDA FALWELL

CASE NO.

KEVIN FALWELL

JURY TRIAL
YES___ NO ☒

I. Statement of Jurisdiction

This Motion is filed in this District Court for the following reasons: Federal Laws that protect people with disability and senior citizens have been violated. Plaintiffs' Constitutional Civil Rights and Human Rights have been violated. Due to the nature of this civil rights violation, the powerful agencies involved and the cover up conspiracy, Litigant strongly believes that this case will be dismissed in Virginia District Court to protect the Defendants and all those involved in protecting the defendants.

II. Statement of Claims

On October 6th, 2022, around 4:00 PM, Plaintiffs were leaving their home to drive to the Fairfax Hospital, to pick up copy of surveillance video of events from the Ashburn Health Plex showing Deputies from Loudoun County Sheriff Department, brutalizing them on the night of September 3rd, 2022. As they were approaching the first traffic light to go to the Fairfax Hospital, a lot of black unmarked cars, pickup trucks and white vans blocked their way. A lot of police officers surrounded Plaintiffs' vehicle. Their weapons drawn and pointing at each Plaintiff's heart and head. Many of the deputies were banging on the doors of the vehicle. They snatched the Plaintiff, Kevin Falwell out the vehicle, but the police refused to state the reason for their actions until Plaintiff, Glenda Falwell started recording with Kevin's phone. They claimed there was a warrant for his arrest. They said that it was because of an incident of September 3rd at the ER. In fact, it was the Loudoun County Sheriff police who assaulted the Plaintiff while he was asleep on the bed at the ER that September 3rd, 2022. Deputies from the Loudoun Sheriff Department arrested the Plaintiff. Plaintiff was falsely accused and criminally charged with: Assault and Battery on Law Enforcement Officer; Obstruction of Justice; Class 6 Felony, Disarm Law Enforcement of Fire Arm; Interference with Officer at Mental Hospital. The arresting Officer was Bryan Nolan, based on reports and sworn statement from Deputy Stewart Marcantel and Justin Sperling. The warrant was signed by Magistrate Victoria C. Dronstick. Buta Biberaj was the Loudoun County Commonwealth Attorney at the time of this conspiracy to cover-up the crimes against the Plaintiffs and the Sheriff Department. All these charges had Sherriff Michael Chapmans planning, approval and name on them.

UNITED STATES DISTRICT COURT
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YES___ NO ☒

That night of Kevin's arrest, Glenda went to Fairfax Hospital, hoping to still get copy of the video that would prove of the Police misconduct and brutality against both Plaintiffs and now the false accusations and false arrest. She was told that security unsuccessfully attempted to retrieve the video, because it seemed that Plaintiff's record had been sealed. Kelly Maio had been spotted at the hospital when Glenda was talking to security before. It is puzzling that the Deputies waited until the day that the video was going to be made available to the plaintiffs to prove the Police misconduct and abuse against them.

The police were unable to produce any evidence of the false charges. They dragged this case for more than a year, long enough to cause undue hardship to Plaintiffs and their families. Plaintiff's human rights, civil rights and religious rights were violated. The Court prohibited Plaintiff from leaving the State of Virginia making it impossible for him to participate of religious activities, seek medical care or go to work. Plaintiff could not attend medical appointments scheduled in Bethesda, Maryland or Washington DC. Plaintiff and his family could not attend religious conventions held in Crownsville, Maryland or Jersey City, New Jersey where the local congregation is assigned to attend. Plaintiff had to miss work when he was assigned to travel to Washington DC through his job.

Due to the inability to prove the false charges against the Plaintiff, the court, the lawyer, the mental health department and mental health workers worked together to conspire to drop the charges based on the Plaintiff's incompetency to stan trial. Eric Shamis who was assigned as the Court Appointed Lawyer to defend Plaintiff never advocated on his behalf. Never requested the court to drop the charges based on lack of evidence against his client. Instead, he engaged in a campaign of intimidation, threatening Plaintiff with jail. He refused to present evidence that would have exonerated the Plaintiff from all criminal charges and proven the Sheriff Department and the deputies that they were lying under oath. Richard Conner sought to arrest Kevin for competency evaluation and training. In a manner of unofficially sealing the Plaintiffs record, Dr. Rashika Renti conducted the evaluation, but refused to provide any information to the Plaintiff. After so much pain and hardship to the Plaintiffs and their family, the charges were dropped on January 17, 2024. A new court appointed lawyer was assigned to this case, Karen E. Kirkpatrick. She also refused to provide any copy of any legal documents that were transferred to her to represent Plaintiff. Just like Dr. Rashika Renti this lawyer unofficially sealed Plaintiff's records.

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III. Statement of Relief

The damage inflicted by the defendants was physical, emotional, mentally and legally. It was a terrorizing experience and it has changed how the Plaintiffs and their family members feel about Law Enforcement, and the Legal System. It destroyed their lives and many opportunities, especially for Kevin. This terrorizing experience not only has destroyed the confidence in institutions and in public servants that are supposed to protect the Plaintiff and not harm them, but it had produced long term and short term damage to his mental, physical health and threatened in many ways their wellbeing.

In order to prevent the Plaintiff from getting evidence, the defendants have engaged in this campaign of terror and conspiracy of cover up to protect the Police and the Sheriff Department. The Plaintiffs are requesting \$25,000,000 reparation, in punitive damages, for ruining their reputation, for the negligence and injury and false statements against the Plaintiff and the horrifying experience the police put them through unnecessarily.

IV. Jury Demand

Plaintiffs are not requesting a trial by jury.

Date: *October 7th, 2024*

Your Signature



Glenda Falwell

21668 Liverpool St. Ashburn, VA 20147

(434) 509 2143

glfalwell@gmail.com